

EXHIBIT 1



HORWITZ, HORWITZ & ASSOCIATES, LTD
Attorneys and Counselors at Law

March 16, 2005

June D. Coleman
MURPHY, PEARSON, BRADLEY & FEENEY
701 University Avenue
Suite 150
Sacramento, CA 95825

Re: Abels v. JBC Legal Group, P.C.. et al.
Case No. C04-02345 RS

Clifford W. Horwitz
Mitchell W. Horwitz*
Jay R. Luchsinger
Wayne L. Newman
Marc A. Perper
Helen Barrett Fanning
O. Randolph Bragg
Richard J. Doherty
Adam M. Mergenthaler
Michael T. Wierzbicki
Mark Weissburg
Robert Groszek
Julie S. Byers
Michael D. Carter
Daniel E. McKenzie
Retired 1998
Andrew J. Horwitz

Dear Ms. Coleman:

I am writing to confirm our telephone discussion of the outstanding discovery matters. Our discussion and agreement is as follows:

- Interrogatories # 1, 2, 3, and 4 and Request for Production of Documents # 1 and 2 – You have agreed to provide the number of purported class members requested by the interrogatories (in # 2 the timeframe is corrected to read June 15, 2000 through June 15, 2004) but not the names and addresses (until class certification). You have stated that there are no documents pertaining to this information.
- ✓ • Interrogatory # 7 and Request for Production of Documents # 7 – You have agreed to explore the provision of the amounts collected. You have stated that there are no documents regarding this information.
- Interrogatory # 10 – You have agreed to explore the provision of the name of the creditor with regard to Raymond Abels.
- ✓ • Interrogatory # 20 – You have agreed to explore the provision of information regarding the distribution of the monies collected through the

use of letters in the form of Exhibits A and B.


- Request for Production of Documents # 3 – You have declined to produce the contracts between the defendants and its creditors based upon the rationale stated in your briefs in opposition to our motion to compel in the Palmer cases.
- Request for Production of Documents # 4 – You have agreed to explore the existence of contracts for the purchase of dishonored checks which resulted in the sending of Exhibits A and B.
- Request for Production of Documents # 5 – You have agreed to produce all documents regarding Raymond Abels.
- Request for Production of Documents # 6 – You have agreed to explore the existence of a job description and duties of Jack Boyajian.
- Request for Production of Documents # 10 and # 11 – Subject to the execution of a confidentiality order in the form provided on the website of the United States District Court for the Northern District of California, you have agreed to provide a documentation of the net worth of JBC Legal Group, P.C. and Jack Boyajian.
- Request for Production of Documents # 12 – You have agreed to explore the existence of documents relating to the maintenance of procedures by defendants to ensure compliance with the FDCPA.

You have agreed to respond regarding the above matters within one week, *i.e.* – by March 23, 2005. I have stressed our need for this information (particularly the amounts collected by defendants) at least one week prior to the mediation which is scheduled for April 20, 2005.

You have confirmed the availability of Jack Boyajian for deposition on April 21, 2005 in San Francisco, California. I shall respond to you with the location.

If any of the above is incorrectly stated, please let me know. Thank you for your prompt attention to this matter.

Sincerely yours,



O. Randolph Bragg

cc: Ronald Wilcox, Esq.